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10 Attorneys for Defendant  
11 Sharon Day  
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8 **UNITED STATES DISTRICT COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

11 CATALINA YACHTS, INC., a  
12 California Corporation,

13 Plaintiff,

14 v.

15 SHARON DAY, an individual;  
16 GERARD DOUGLAS, an individual;  
17 and DOES 1 through 10, inclusive,

18 Defendants

19 GERARD DOUGLAS,

20 Plaintiff

21 v.

22 Defendant

23 and

24 SHARON DAY,

25 Counterclaim Plaintiff,

26 v.

27 CATALINA YACHTS, INC.,  
28 a California Corporation,

Case No. 2:25-CV-04090-SVW-RAO

Assigned to The Hon. Stephen V.  
Wilson

**DECLARATION OF STEVEN M.  
BERMAN IN SUPPORT OF  
MOTION FOR PARTIAL  
SUMMARY JUDGMENT**

*[Filed concurrently with Notice of  
Motion and Memorandum of Points  
and Authorities; Statement of  
Uncontroverted Facts; and [Proposed]  
Order]*

Date: January 26, 2026  
Time: 1:30 p.m.  
Courtroom 10A

Action Filed: May 7, 2025  
Trial Date: February 17, 2026

Counterclaim Defendant.

**DECLARATION OF STEVEN M. BERMAN**

I, Steven M. Berman, declare as follows:

1. I am an attorney duly admitted to practice before this Court and counsel of record for Defendant/Counter-Plaintiff Sharon Day (“Ms. Day”). I have personal knowledge of the facts set forth herein and if called as a witness, I could and would competently testify to the matters stated herein. I make this declaration in support of Ms. Day’s Motion for Partial Summary Judgment.

2. On May 7, 2025, Catalina Yachts, Inc. (“Catalina”) filed its Complaint against Ms. Day and Gerald Douglas. Doc. 1. Exhibit 1 to Catalina’s Complaint is the Bonus Compensation Agreement dated November 18, 2002. *See* Doc. 1-1.

3. On July 28, 2025, Ms. Day filed the Answer and Counterclaims of Defendant Sharon Day. *See* Doc. 46. On October 28, 2025, Ms. Day filed the Amended Answer and Counterclaims of Sharon Day. *See* Doc. 77.

4. Attached hereto as **Exhibit 1** is a true and correct copy of excerpts from the deposition transcript of the corporate representative of Catalina, taken on December 10, 2025.

5. Attached hereto as **Exhibit 2** is a true and correct copy of the warranty deed reflecting the First Sale to Generation Church of Tampa Bay, Inc.

6. Attached hereto as **Exhibit 3** is a true and correct copy of the warranty deed reflecting the Second Sale to Prometheus Maritime Properties.

7. Attached hereto as **Exhibit 4** is a true and correct copy of the Asset Purchase Agreement with Michael Reardon.

1 8. Attached hereto as **Exhibit 5** is a true and correct copy of the Affidavit  
2 of Michael Reardon.

3 9. Attached hereto as **Exhibit 6** is a true and correct copy of an excerpt  
4 from the deposition transcript of Keith Lichtman, taken on December 8, 2025.

5 10. Attached hereto as **Exhibit 7** is a true and correct copy of the Bonus  
6 Compensation Agreement dated November 18, 2002.

7 11. On December 5, 2025, I met and conferred via video conference with  
8 Catalina's counsel and Gerard Douglas' counsel regarding our planned motion for  
9 summary judgment.

10 I declare under penalty of perjury under the laws of the United States of  
11 America that the foregoing is true and correct.

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13 Executed on this 22<sup>nd</sup> day of December 2025 in Houston, Texas.

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18 Steven M. Berman  
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